

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

THE SATANIC TEMPLE, INC.

Plaintiff,

v.

SAUCON VALLEY SCHOOL DISTRICT,

Defendant.

Civil No.: 5:23-cv-01244

**ELECTRONICALLY FILED**

**IMMEDIATE RELIEF SOUGHT**

**PLAINTIFF'S MOTION TO EXCEED THE PAGE LIMITS**

Plaintiff, The Satanic Temple, Inc. ("TST"), respectively moves this Court for leave to file a Brief in Support of TST's Motion for a Temporary Restraining Order and/or Preliminary Injunction in excess of twenty pages. In support of this motion, Plaintiff states as follows:

1. As the relief requested by is emergency relief, counsel began preparing TST's motion before the complaint in this case was assigned to any judge in the Eastern District of Pennsylvania.

2. Thus, when TST became aware of the judicial assignment this afternoon, and this Court's twenty-page limit on opening briefs, which is inclusive of tables of contents and attachments, it had already prepared materials in excess of that limit. The body of Plaintiff's brief is 25 pages, plus one caption page, one page for the Table of Contents, and one page for the certificate of service. The remaining 36 pages are exhibits in support of the brief, offered to assist the Court in rendering its ruling. In total, then, Plaintiff requests to file a total of 64 pages.

3. There is good cause to allow Plaintiff to file an oversized brief here. The overwhelming majority of the contents that exceed the Court's page limit are the exhibits, which will support two of Plaintiff's main arguments—that the Defendant's proffered rationale for its conduct (enforcement of Defendant's policy) is a pretext and that Defendant's specific enforcement of the relevant policy in this matter against Plaintiff is discriminatory. In addition, because Plaintiff requests emergency relief in this matter, it has strived to file its brief and supporting materials with the Court as quickly as possible, both to give the Court time to digest the materials and to provide Defendant and Defendant's counsel time to review them. Plaintiff seeks to avoid further delay in doing so by extensively revising its materials to meet the twenty-page limit.

4. Accordingly, to fully address the issues presented in this case and avoid further delay, Plaintiff requests leave to file a total of 64 pages for its attached brief, which is inclusive of all exhibits.

WHEREFORE, for the reasons presented, Plaintiff respectfully requests that the Court grant this motion and allow Plaintiff to file its Brief in Support of TST's Motion for a Temporary Restraining Order and/or Preliminary Injunction in excess of twenty pages.

Respectfully Submitted,

Dated: March 31, 2023

Sara J. Rose (PA Bar No. 204936)  
Richard T. Ting (PA Bar No. 200438)  
ACLU of Pennsylvania  
P.O. Box 23058  
Pittsburgh, PA 15222  
Tel: (412) 681-7864  
*srose@aclupa.org*  
*rting@aclupa.org*

Daniel Mach (D.C. Bar No. 461652)\*  
Heather L. Weaver (D.C. Bar No. 495582)\*  
American Civil Liberties Union Foundation  
915 15th Street, NW  
Washington, DC 20005  
Tel: (202) 675-2330  
*dmach@aclu.org*  
*hweaver@aclu.org*

/s/ Will W. Sachse  
Will W. Sachse (PA Bar No. 84097)  
Noah Becker (PA Bar No. 327752)  
Dechert LLP  
Cira Centre  
2929 Arch Street  
Philadelphia, PA 19104  
Tel: (215) 994-2496  
*will.sachse@dechert.com*  
*noah.becker@dechert.com*

*Counsel for Plaintiff*

*\*Motion for Pro Hac Vice Admission Pending*